

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

January 4, 1985

New Bedford
51752

DATE

SUBJECT

Review of New Bedford Municipal Sewage Sludge Incinerator
Draft Report

FROM

Margaret McDonough, Environmental Scientist
State Air Programs Branch

MM

TO

Gerard Sotolongo
Waste Management Division

I have reviewed GCA's Draft Final Report dated November, 1984.
My comments are as follows:

1. Level of Detectability. The lowest level of detectability of any dioxin isomer, 3.0 ug/m3, is quite high. By way of comparison, EPA measured a stack emission concentration of approximately 240 ng/m3 TCDD at a municipal incinerator (Hampton, VA, fall, 1983) which was considered to be a level of concern based on a cancer risk assessment.
2. "Conclusions", page 28. The author concludes that PCB's, dioxins and furans are not being emitted. The levels of detectability for dioxin are too high to conclude that dioxins are not being emitted. The 3.0 ug/m3 limit is high in comparison to levels that may be of concern and to sensitivity of emission testing done elsewhere. The level of detectability should be discussed; as written, this section is misleading.

As you know, EPA's National Dioxin Strategy includes testing of combustion sources (Tier 4). To date two sewage sludge incinerators have been tested. (Results are not available yet.) Although it is not likely that another sludge incinerator will be tested, the New Bedford incinerator is still considered to be a possible candidate for testing.